

EXHIBIT 29

Isabel Longoria

April 20, 2022

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

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1 UNITED STATES OF AMERICA *

2 v. * CASE NO. 5:21-cv-1085-XR

3 THE STATE OF TEXAS, et al *

4 * * * * *

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6 ORAL AND VIDEOTAPED DEPOSITION OF

7 ISABEL LONGORIA

8 APRIL 20, 2022

9 VOLUME 1 OF 2

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11 Oral and videotaped deposition of Isabel Longoria,
12 produced as a witness at the instance of the plaintiffs, and duly
13 sworn, was taken in the above-styled and numbered cause on April
14 20, 2022, from 2:45 p.m. to 4:56 p.m., before Terrie Doyle
15 Escobar, CSR in and for the State of Texas, reported by oral
16 stenography, at the Office of the Texas Attorney General,
17 Consumer Protection Division, Houston Regional Office, 808 Travis
18 Street, Suite 1520, Houston, Texas 77002, pursuant to Rule 30 of
19 the Federal Rules of Civil Procedure.

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21 APPEARANCES:

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23 FOR THE PLAINTIFFS:

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MR. KENNETH E. BROUGHTON

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REED SMITH, LLP

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1 expansion of early voting for three weeks instead of two weeks.

2 Q. In 2020, did you have the authority to offer more early
3 voting days if you determined Harris County wanted that, or is
4 that something that's just prescribed by either the governor or
5 the secretary of state?

6 A. As I remember correctly, the governor's order allowed
7 for an expansion of three weeks. I can't remember -- or an extra
8 week of early voting. I can't remember if Harris County had the
9 option to engage in it or if it was mandated that all counties
10 engage in three weeks of early voting. I'd be happy to look that
11 up. I can't remember the difference.

12 Q. Do you recall what hours the polls were opened during
13 early voting for the 2020 election?

14 A. On most weekdays of early voting the polls would have
15 been open from 7:00 a.m. to 7:00 p.m. with the exception of
16 Sundays in which voting was open from -- I believe at that time
17 -- I can't remember if it was noon to 7:00 p.m. or noon to 6:00
18 p.m. And then on -- there was three days, if I'm not mistaken,
19 of expanded voting where voting was offered until 10:00 p.m. and
20 one day where voting was offered continuously for 24 hours. And
21 I -- we can -- I'm happy to provide to you and look back on the
22 record on the exact number of expanded hour days.

23 Q. Okay. Who decided -- who gets to decide what hours the
24 polls open and close in Harris County for the 2020 election?

25 A. The early voting clerk who -- which at the time was

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1 in our voter registration department, increasing more staff or
2 the clearance for paying more staff on the early voting ballot
3 board signature verification committee and central counting
4 station. I believe they had to at one point either double or
5 triple the staff that they would have normally had for an
6 election of this size in order to research every single mail
7 ballot that came in, where before when all you had to do was
8 compare the signature and that took a matter of -- well,
9 actually, I know -- it took exactly five seconds to either
10 approve or reject a mail ballot. Since then, it has increased to
11 between 30 seconds and one minute to process any given mail
12 ballot carrier envelopes since you have to do that kind of ID
13 research.

14 MR. BROUGHTON: I know we were going to quit at
15 about 5:00. It's 4:56, and I have like a whole different topic.
16 So probably it makes sense just to quit now; right?

17 MR. THOMPSON: That's fine.

18 MR. BROUGHTON: Okay. And we'll recess for the
19 day.

20 THE VIDEOGRAPHER: Off record at 4:56.

21 (Proceedings adjourned at 4:56 p.m.)

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